UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

FORTUNATA LIANA IE, individually and in behalf of all other persons similarly situated,

Plaintiff,

-against-

15 CV 63 (JGK) (SN)

AGEHA JAPANESE FUSION, INC., and CHUN YONG CHEN, jointly and severally,

Defendants.

NOTICE OF MOTION

Please take notice that, upon the accompanying memorandum of law and the pleadings herein, the plaintiff's counsel, the Law Office of Justin A. Zeller, P.C., will move this Court, before Hon. Sarah Netburn, United States Magistrate Judge, for an order fixing the charging lien of the Law Office of Justin A. Zeller, P.C., and entering judgment against Fortunata Liana Ie, Ageha Japanese Fusion, Inc., and Chun Yong Chen, jointly and severally, and such other and further relief as the Law Office of Justin A. Zeller may be entitled by law.

LAW OFFICE OF JUSTIN A. ZELLER, P.C.

By:

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ATTORNEYS FOR PLAINTIFF

Dated: New York, New York February 20, 2018